

Content Analysis of Public Comments - Process Overview

Prescribed Fire Management

Francis Marion National Forest

8/14/2019

Prepared by: Mary Morrison, Bob Dellinger, Larry Hayden, and Paul Churchill

On June 29, 2018 a scoping letter proposing a strategy on prescribed fire management for the Francis Marion (FM) National Forest was distributed via hard-copy mail and email to the district's mailing list. The scoping period ran from July 9 to August 8, 2018. Twenty-nine emails were received from 19 individuals during the scoping period. No public comments were received via postal delivery. The content analysis of the public comments went through a series of steps that are described below. The emails and attachments received were reviewed for comments and the comments were tracked throughout the content analysis process. Based on the review of the public comments, most public comments were not brought forward for further analysis, while four issues were identified and will be used to frame the effects discussion in the environmental assessment (EA) for this project. Three alternatives were brought for detailed consideration: The proposed action used for scoping; Current Prescribed burning (no action) and the modified proposed action developed by the ID team to address fire management in the four Wildernesses.

Step 1 – Set up and Initial Review

All emails and letters were assigned a unique number using a combination of the initials of the commenter and a number for each document received from that commenter. For instance, a commenter with the initials DH that submitted four emails would have those emails marked as DH-1, DH-2, DH-3 and DH-4, in the order that they were received. Some emails are duplicates and are noted in Tables 1 and 2. Some emails were similar enough in content to be grouped as form letters.

Emails and letters were grouped into two sections:

- **Section 1** contains unique public comments from 4 individuals in 5 emails. Most of these comments supported an increased burning program with more frequent prescribed fire to provide for restoration of longleaf pine and associated wetland communities, as well as maintain habitats for rare wildlife species. See Table 1 below.
- **Section 2** is a grouping of 24 emails submitted by 20 members of the Carolina Wildlife Syndicate (CWS). Eighteen of these 24 emails were and are grouped together for analysis in the next step of the content analysis of public comments. These emails expressed concerns about the prescribed burning program, particularly impacts to turkey nests and fawns during the growing season. The remaining 6 emails contain comments from Wilton Stribling and David Strickland. Their more detailed emails were used to identify concern statements in Steps 2 and 3. See Table 2 below.

Table 1. Section 1- Tracking of public comments that were unique and used to develop concern statements

Number	Commenter	Email Tracking
BT1 BT2	Bill Twomey	two emails, but only BT1 analyzed in section 1. BT2 was a reply back to Rhea stating his support and offering to help.
JH1	Jeff Holmes	one email with attachment
JB1	John Brubaker	one email with three attachments
RC1	Ray Cartonia	one email with attached letter.

Table 2. Section 2 - Tracking of similar emails that were grouped to identify concern statements

Number	Commenter	Number of Emails	Email Tracking
DS1 DS2 DS3 DS4	David Strickland	Four emails: two are duplicates	Three unique emails are detailed in section 2 of the analysis of public comments.
WS1 WS2	Wilton Stribling	two emails, but are duplicates	WS1 and WS2 are identical to CS1.
No.	Grouped Emails	No.	Grouped Emails
BH1	Bill Hills	KO1, KO2	Kaye Owens
CS1	Chuck Sitka	RW1, RW2	Ricky Wren
DD1	Dale Daigle	RM1	Robert Mills
EC1	Eddie Cox	TyB1 to TyB4	Ty Bodiford
HS1	Herb Strickland	TB1	Tyler Blanchette
JF1	John Fuss	WL1	Wayne Lackey
JW1	Justin Wiles		

Step 2 – Review of Concern Statements

Public comments were grouped around themes to form concern statements and were assigned a tracking number. Slight modifications were made in the grouping of the concern statements during an internal review by ID team members who worked on the responses. More detailed responses are in Appendix A. Below is a summary:

- From Section 1, concern statements focused on the need for frequent fire and prescribed fire in the growing season to maintain habitats for rare species and to restore longleaf pine and wetlands.
- From Section 2, concern statements focused on effects to turkey poult and deer fawns from prescribed burning during the growing season, recommended edits to the FM forest plan, wanted clarification on the reporting of monitoring efforts, and raised concerns about the clarity of the proposed action.
- Concern statements used to develop the four issues are listed below in Step 3.
- Most concern statements were not brought forward for analysis in the environmental assessment for a variety of reasons, such as they were outside the scope of the decision; did not meet the purpose and need or forest plan direction; or asked for clarification of the proposed action. The responses to these concern statements are in Appendix A of this document.
- Two alternatives were requested by the public. These alternatives were considered but were not brought forward for analysis. CEQ regulations part 1502.14 states that agencies shall rigorously explore and objectively evaluate all **reasonable alternatives**, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated. Reasonable alternatives are those that 1) meet the purpose and need of the proposed action, 2) reduce potential adverse impacts on the human environment, and 3) are feasible from a technical and economic standpoint. Most common reasons to eliminate an alternative: Fails to meet purpose and need, Clearly unreasonable, Unreasonable environmental harm, Technologically infeasible, Illegal, Duplication with the existing range or cannot be implemented.
 - *To prescribed burn 160,000 acres per year is technically infeasible due to smoke management requirements and cannot be implemented due to the fiscal and staffing capacity and greatly exceeds the purpose and need of approximately 50,000 acres per year of prescribed fire.*
 - *A proposed alternative from a member of the public with restrictions on the fire program, included: Annual burning limits of 50,000 acres, including wildfires; Limits of 16,500 acres on fire ignited during the growing season broken down by early, mid-and late growing season; Increase protection of hardwoods Report all acres within a compartment not just the blackened pine component. This proposed alternative does not meet the purpose and need on ecological restoration and does not meet forest plan direction to maintain, improve and restore ecosystems.*

Step 3 –Issues and Associated Concern Statements Considered for Effects Analysis

Based on public comments received during scoping and team deliberations, four issues were identified for detailed analyses because the effects of prescribed fire activities may be related to potential significance or the ability to meet the need of the project. The following issues were identified and analyzed to determine the potential for NEPA significance:

Issue 1: Prescribed fire can have unintended consequences to habitats for wildlife.

Concern 7b - Burn blocks should be smaller especially during the growing season to reduce impacts to wildlife.

Concern 20b – Dormant season burns can negatively impact amphibians because they are active in wet periods the fall and are susceptible to fire.

Concern 21- Fire maintained Pocosins are important habitat for reptiles and amphibians.

Concern 22 - Frequent large-scale fire extending into the growing season is needed to maintain and restore habitats for Red-cockaded Woodpecker (RCW).

Concern 34 – Herpetology diversity is highest in uneven-aged structural diversity with more diverse herbaceous layer.

Concern 33 - The ecological benefits of occasional burn-caused canopy openings and standing dead snags should not be overlooked and provides benefits to many at risk herps.

Concern 27 – Loss of some turkey nests outweighs the overall ecosystem benefits and wildlife habitat improvements.

Issue 2: Prescribed fire in the Francis Marion can cause Smoke management concerns.

Concern 16 - Fuel reduction should be emphasized in MA2 along with constructing permanent firelines to protect private property.

Concern 28 - Emphasize fuel reduction in the wildland urban interface (WUI) in MA2

Issue 3: Prescribed fire can have unintended effects to merchantable timber and mast-producing vegetation.

Concern 10 - The firing techniques used by the burn crews create high intensity fire, resulting in reduced mast production.

Concern 11 - The firing techniques used by the burn crews in recent years have resulted in substantial loss of marketable trees.

Concern 25 – Hard and soft mast are provided in longleaf pine ecosystems;

Issue 4: Fire management in Wildernesses may impact Wilderness character.

Concern 12- What criteria will you use when you will use prescribed fire in a Wilderness Area.

Concern 30 – I support the proposed Fire Management Operations Plan in Wilderness areas on the FMNF.

Appendix A: Response to Public Comments and Concern Statements

Concern Statement	Forest Service Response
<p>Concern 1 –A proposed alternative from a member of the public with restrictions on the fire program.</p> <ol style="list-style-type: none"> 1. Annual burning limits of 50,000 acres, including wildfires 2. Limits of 16,500 acres on fire ignited during the growing season broken down by early, mid-and late growing season, 3. Increase protection of hardwoods 4. Report all acres within a compartment not just the blackened pine component. 	<ol style="list-style-type: none"> 1. The Revised Forest Land Management Plan (2017) and associated Final Environmental Impact Statement (FEIS) provides the rationale for desired conditions associated with maintaining ecologically sustainable ecosystems, anticipated average annual prescribed burn frequencies and growing season burn frequencies needed to achieve those desired conditions, and the desired condition that these fires be of low intensity. These documents are posted at https://www.fs.usda.gov/detail/scnfs/landmanagement/planning/?cid=FSEPRD575346. Additionally, the forest plan assessment and the final environmental impact statement for the forest plan include analysis and a summary of literature related to the historic fire return intervals and the ecosystems that occurred on the Francis Marion National Forest. The desired conditions associated with the Revised Forest Land Management Plan (2017) and associated FEIS, are also the result of strategies for maintaining and restoring ecological conditions for threatened, endangered, and species of conservation concern. Development of the Revised Forest Land Management Plan involved extensive public involvement including numerous public meetings incorporating comments on draft and final forest plans and associated analysis, as well as formal consultation with the U.S. Fish and Wildlife Service. This proposed limit in this suggested alternative does not meet the FM forest plan objectives of providing prescribed fire on 50,000 acres in MA1 annually or reducing fuel loadings on 15,000 acres in MA2. Also, see the response to concern 8 below. 2. The Revised Forest Land Management Plan (2017) and associated FEIS and Biological Assessment (BA) contained both analysis and assumptions made for desired conditions associated with maintaining ecologically sustainable ecosystems, including the assumption that fire-adapted ecosystems would be prescribed burned periodically during the growing season. In order to meet the objective for maintaining or restoring longleaf ecosystems at a 2-year average fire return frequency with a growing season burn every third burn on 91,500 acres alone will require 15,250 acres of growing season burning annually. The growing season provides the best time of year for prescribed burning by providing some of the best prescribed burning weather parameters on the forest. We need to take advantage of this time of year to treat as much of the forest as we can to provide for healthy functioning ecosystems while reducing the severity of wildfires. In the FEIS, Table 2-2, the following acreages were used for

Appendix A: Response to Public Comments and Concern Statements

Concern Statement	Forest Service Response
	<p>the effects analysis: Dormant Season Prescribed Burning (acres per decade) 195,000–325,000 and Growing Season Prescribed Burning (acres per decade) 105,000–175,000.</p> <p>3. The district and forest will continue to monitor progress towards meeting objectives for maintenance and restoration of Oak, Mesic Hardwood, and Maritime Forests, and narrow forested swamps and blackwater stream forests, which include an oak component. In addition, scrub oaks such as runner oak, dwarf live oak, blackjack oak, upland live oak, and turkey oak occur in the ground and shrub layer of longleaf ecosystems – particularly on xeric and subxeric sites, and are fire-adapted. Firing techniques have not changed over time but fuel loads have changed the areas of the forest that have not had a consistent fire return interval. There have not been any areas of the forest where a substantial loss of marketable trees have been planned to be sold. Some tree mortality is anticipated in any prescribed fire operation. Unfortunately, when improving and restoring both the fire regime condition class and the ecosystem condition class, at times and at localized scales, fire may occur at moderate or high intensity as a result of fuel loading, flammability, and fire exclusion which is considered when planning and implementing prescribed burns. However, the fires are typically of small scale and duration and not at the landscape or even stand scale. High intensity fires are a result of high fuel loading and fire exclusion combined with unfavorable weather conditions. Forest Plan desired conditions for low intensity burns are likely once stands have achieved the fire regime condition class 1 and maintenance ecosystem condition class. Runner oak is a major component of the fire-adapted longleaf pine ecosystems, especially in more xeric sites. There are numerous fire-adapted woody species whose growth habits are low to the ground, produce mast, and thrive in a fire environment. Most of these species need a fire free year for fruit and acorn production. Such species include dwarf blueberry, creeping blueberry, runner oak, dwarf chinquapin, and dwarf huckleberry, among others. While it may seem reasonable that mast production in open pinelands may not be as great as stands with abundant oak and hickory in the mid-story, it would be hard to argue that a biennially burned pine land with an open mid-story does not have enough mast, fruit, and browse in the understory to sustain game populations, especially when considering adjacent transition zones and hardwood communities, where fire penetrates less completely and mid-stories are more developed. Forest Service</p>

Appendix A: Response to Public Comments and Concern Statements

Concern Statement	Forest Service Response
	<p>vegetation data (FSVEG) shows 28,182 acres in bottomland oak or mixed pine-oak and oak-pine forests (Management Area 1 = 10,235 acres; Management Area 2 = 17,947 acres) and 3,098 acres in upland hardwood with oak as a component (Management Area 1 = 1,578 acres; Management Area 2 = 1,520 acres ; queried 2/2016).</p> <p>4. Standard reporting practices are to report the areas that were blackened and count those acres.</p>
<p>Concern 1b- The Francis Marion staff feels some pressure to burn a certain number of acres every year rather than meet burn objectives.</p>	<p>Burn objectives are identified in the burn plans and staff implementing prescribed burns attempt to meet burn objectives. The Forest Service Southern Region Office has not given a target to the forest for prescribed burn acres in several years. Rather, treatment acreage targets are based on desired conditions for forest types. We do our best to protect the urban interface from catastrophic fire while maintaining fire adapted ecosystems on the forest.</p>
<p>Concern 2- Recognize hunting as a tradition in the FM Forest Plan</p>	<p>This comment is outside the scope of this decision. The 2017 Francis Marion Forest Plan includes numerous references to the importance of hunting and game management. The majority of the Francis Marion is in a wildlife management area that is managed cooperatively with the SC Department of Natural Resources. There are numerous references to dispersed recreation activities throughout the forest plan, which includes hunting and fishing, as well as hiking, biking and horseback riding. Notably, prescribed burning is an important tool in managing habitat for game species.</p>
<p>Concern 3 –Recognize game management and game species in the FM Forest Plan</p>	<p>This comment is outside the scope of this decision. The 2017 Francis Marion Forest Plan includes numerous references to the importance of hunting and game management. The majority of the Francis Marion is in a wildlife management area that is managed cooperatively with the SC Department of Natural Resources. Notably, prescribed burning is an important tool in managing habitat for game species.</p>
<p>Concern 4 –why has the number of turkeys one is allowed to kill in a season lessened instead of increased?</p>	<p>The Forest Service does not set hunting harvest limits. Harvest limits are set by the South Carolina Department of Natural Resources. Prescribed fire is not anticipated to adversely impact persistence of wild turkey populations. The National Wild Turkey Federation (NWTf)’s position statement on prescribed fire is posted at http://www.nwtf.org/conservation/article/prescribed-fire-letter. An excerpt from NWTf’s position statement includes:</p>

Appendix A: Response to Public Comments and Concern Statements

Concern Statement	Forest Service Response
	<p><i>Unfortunately, many blame poor reproduction and observed declines in hunter harvest on the use of prescribed fire, particularly burns conducted during the growing season, which coincides with the spring nesting season for wild turkeys. While the loss of wild turkey nests to prescribed fire is a legitimate concern, a majority of wild turkey research shows very few turkey nests are lost directly because of springtime burns. Research suggests that hens prefer nesting in areas that have been burned within the past two years and not in high numbers in unburned areas because the habitat is too thick. For the few nests that are lost due to habitat management activity, predation, or even weather-related events, it's important to note that hens may re-nest up to three times.</i></p>
<p>Concern 5 –Create four management areas in the FM forest plan to focus on management of game species</p>	<p>Changes to the 2017 Francis Marion Forest Plan and management of game species are outside the scope of this decision. There are numerous references to hunting and fishing throughout the 2017 Francis Marion Forest Plan. Notably, prescribed burning is an important tool in managing habitat for game species.</p>
<p>Concern 6 – Recognize European Descendants in the FM Forest Plan</p>	<p>This comment is outside the scope of the decision. Changes to the 2017 Francis Marion Forest Plan are not being considered as part of this decision. This project focuses on fire management rather than the social background and makeup of the region. There are various references to crossroad communities in the 2017 Francis Marion Forest Plan.</p>
<p>Concern 7a – Use less aerial ignition to reduce fire intensity. Concern 23 –Use of hand ignition over aerial ignition might address some public concerns, but could increase the number of constructed firelines. Avoid the current practice of repeated fly-overs. Concern 32 – Adjusting aerial ignition patterns, such as</p>	<p>Aerial ignition is used on approximately 50% of the prescribed burns on the forest. Aerial ignition is a valuable tool with many advantages, some of which are providing a faster smoke lift resulting in less smoke impacts for the surrounding roadways and communities, and providing for less human travel within the burn blocks which results in safer conditions for firefighters. The helicopter is used as a fire lookout to provide direct communication to the burn boss on fire behavior and location, fuel consumption, spotting potential and areas of potential smoke impacts.</p> <p>Aerial ignition does not inherently result in a more severe burn than hand ignition. Adjusting aerial ignition patterns so that the plastic spheres are spaced further apart within each firing strip helps to reduce fire intensity when burning conditions intensify as the day progresses. Also, igniting and securing base lines before the peak burning period may also help to reduce tree mortality.</p>

Appendix A: Response to Public Comments and Concern Statements

Concern Statement	Forest Service Response
spacing of spheres and securing firelines prior to peak burning periods, may help reduce fire intensity.	Depending on the prescribed burn history of a unit, weather conditions, and resources, aerial ignition patterns will change. The burn boss will strive to achieve secure fire lines before peak burn temperatures.
<p>Concern 7b - Burn blocks should be smaller especially during the growing season to reduce impacts to wildlife.</p> <p>Concern 20b – Dormant season burns can negatively impact amphibians because they are active in wet periods the fall and are susceptible to fire.</p> <p>Concern 21- Fire maintained Pocosins are important habit for reptiles and amphibians.</p> <p>Concern 22 - Frequent large scale fire extending into the growing season is needed to maintain and restore habitats for Red-cockaded Woodpecker (RCW).</p> <p>Concern 27 – Loss of some turkey nests outweighs the overall ecosystem benefits and wildlife habitat improvements.</p>	<p>These concerns (7b, 20b, 21, 22, and 27) are analyzed in the EA under Issue 1.</p>

Appendix A: Response to Public Comments and Concern Statements

Concern Statement	Forest Service Response
<p>Concern 33 - The ecological benefits of occasional burn-caused canopy openings and standing dead snags should not be overlooked and provides benefits to many at risk herps.</p> <p>Concern 34 – Herpetology diversity is highest in uneven-aged structural diversity with more diverse herbaceous layer.</p>	<p>These concerns (33 and 34) are analyzed in the EA under Issue 1.</p>
<p>Concern 8 – True Climax Forest is mixed Pine-Hardwood Forest and Oak-Hickory Forest not the fire-adapted longleaf pine forest.</p>	<p>This comment is not supported by science. The forest plan assessment and the final environmental impact statement for the forest plan include analysis and a summary of literature related to the historic fire return intervals and ecosystems that occurred on the Francis Marion National Forest. These documents are located on the Francis Marion and Sumter National Forests’ public website. Please refer to these documents for additional information.</p>
<p>Concern 9 – Define low intensity fire in the FM Forest plan</p>	<p>Changes to the FM Forest Plan are outside the scope of this decision. Objectives for each prescribed burn are documented in a burn plan. Forest Plan desired conditions for low intensity burns are likely once stands have achieved the fire regime condition class 1 and maintenance ecosystem condition class.</p>

Appendix A: Response to Public Comments and Concern Statements

Concern Statement	Forest Service Response
<p>Concern 10 - The firing techniques used by the burn crews create high intensity fire, resulting in reduced mast production.</p> <p>Concern 25 – Hard and soft mast are provided in longleaf pine ecosystems.</p>	<p>These concerns are brought forward for analysis in the EA in Issue 3: Prescribed fire can have unintended effects to merchantable timber and mast-producing vegetation.</p>
<p>Concern 11 - The firing techniques used by the burn crews in recent years have resulted in substantial loss of marketable trees</p>	<p>These concerns are brought forward for analysis in the EA in Issue 3: Prescribed fire can have unintended effects to merchantable timber and mast-producing vegetation.</p>
<p>Concern 12- What criteria will you use when you will use prescribed fire in a Wilderness Area.</p> <p>Concern 30 – I support the proposed Fire Management Operations Plan in Wilderness areas on the FMNF.</p>	<p>These concerns are brought forward for analysis into the EA in Issue 4: Fire management in Wildernesses may impact Wilderness character.</p> <p>Wilderness areas on the forest are mainly comprised of broad forested swamps and large river floodplains. Prescribed fires managed outside of the wilderness areas will be permitted to burn into the wilderness and extinguish in the wet peripheries of the wilderness. This has been the historical tactic on the forest as it results in less damage to the landscape by removing the need for constructed fire lines.</p> <p>The Agency Wildfire Fire Support System Protocol is used for fire management in the four wildernesses on the FM. The Draft Fire Operation Plan for Wilderness with additional information is posted on-line at https://data.ecosystem-management.org/nepaweb/nepa_project_exp.php?project=53945. This document includes the protocol when a prescribed fire or natural ignition wildfire would be allowed to spread into a wilderness area on the Francis Marion National Forest.</p>

Appendix A: Response to Public Comments and Concern Statements

Concern Statement	Forest Service Response
<p>Concern 13a - How do you plan to monitor and document fire affects in the future? Concern 31a – Annual Dissemination of the Burn Accomplishments and Monitoring Effects would be helpful to the public.</p>	<p>Discussion of on-going monitoring and how that will be made available to the public will be provided in the Environmental Assessment. Part of the proposed action is to develop a feedback loop with the public on burn accomplishments and we appreciate your comments on how we can make it better. More information about the monitoring program and how we make that information available to the public will be clarified in the EA. To keep the public informed, we would post a map of all the priority locations for a planned fire within a given year on the forest webpage. However, it should be noted, that the map would not identify specific implementation days, as the ability to implement varies greatly from day to day with weather and fuel conditions. Annual burn accomplishments would be provided from the district office and on-line. As part of this project, posting of burn accomplishments and monitoring would be posted on-line.</p> <p>Monitoring effects are taken the day of the burn and up to one year after the burn for selected locations. We currently monitor 7 locations for fire effects, including fuel loading, char- height, burn severity, seedling & saplings, and overall health of the over story. As we move into new locations on the forest, additional monitoring locations would be identified. The district and forest would continue to monitor fire intensity using tools such as the Rapid Assessment of Vegetation Condition after Wildfire (RAVG) and would incorporate that information in project monitoring strategies.</p>
<p>Concern 13b- The Proposed Action-Francis Marion Prescribed Fire Adaptive Management Strategy seems like a very vague programmatic concept.</p>	<p>The strategy is an effort to explain how we will manage prescribed fire across the entire Francis Marion National Forest. We will clarify the proposed action in the environmental assessment.</p>
<p>Concern 14a - Staffing should be increased in the dormant season to increase the prescribed fire program in the winter months.</p>	<p>Winter months often are encumbered by weather that is not suitable for prescribed fire and other forest priorities. Cold fronts during the winter often affect smoke dispersion patterns making prescribed fire impossible.</p>

Appendix A: Response to Public Comments and Concern Statements

Concern Statement	Forest Service Response
Concern 14b – The helicopter contract should be altered to begin on October 15 and end February 15.	Contractual concerns related to the management of the helicopter are outside the scope of this decision. The helicopter is needed for wildfire response and is also used by the SC Forestry Commission.
<p>Concern 16 - Fuel reduction should be emphasized in MA2 along with constructing permanent firelines to protect private property.</p> <p>Concern 15 – Why are there no Burn Plans for MA2?</p> <p>Concern 28 - Emphasize fuel reduction in MA2 (WUI)</p>	<p>These concerns are brought forward into the EA for analysis in Issue 2.</p> <p>A primary purpose of this project is to introduce burning in MA2. As stated in the Forest Plan, the protection of human communities from wildfire is an emphasis of Forest Plan direction for MA2. The Wildland Urban Interface is a priority for burning in MA2. Fire Regime Condition Class is a measure used to look at the departure from the historic fire return interval and is used as a measure of fire risk and will be used to evaluate risks to human health and safety. Prescribed fire would be used in combination with mechanical treatments to reduce the fuel build-up that threatens private lands.</p> <p>Fire lines would be constructed as needed to protect private inholdings. Wyden agreements will be used as an alternative to fire lines when agreements are in place. Maintenance of permanent firelines is not practical. Partner driven opportunities to maintain firelines would be considered.</p> <p>The proposed action is a strategic approach to manage prescribed fire across the FMNF. Portions of MA2 have not been prescribed burned in over 25 years, so burn blocks would need to be developed along with construction of firelines. Typically, burn plans are developed after a decision document authorizing prescribed burning has been signed. Currently, portions of MA2 are not covered by a decision which authorizes prescribed burning. This proposed action would authorize prescribed burning activities as part of an adaptive management plan to manage prescribed fire across the Francis Marion National Forest. Burn plans would be developed as firelines are constructed under implementation of the proposed project.</p>
Concern 17 – Frequent fire is a primary ecological process;	To prescribed burn 160,000 acres per year is technically infeasible due to smoke management requirements. Burning 160,000 acres per year exceeds the FM forest plan objectives of 50,000

Appendix A: Response to Public Comments and Concern Statements

Concern Statement	Forest Service Response
Concern 18 – More fire is needed to achieve ecological restoration including biennial burning; Prescribed burning on 160,000 acres per year was suggested to meet desired conditions for longleaf pine restoration.	acres in MA1 and 15,000 acres in Management Area 2 (MA2) and exceeds the current capacity of the Francis Marion National Forest staffing and funding.
Concern 19 – Frequent growing season burns are needed for restoration of longleaf pine ecosystems and the prescribed fires should be not limited to 33% during the growing season.	Some have proposed that additional growing season burning is needed to meet ecosystem restoration objectives. Currently, we are developing the first biennial monitoring report under the 2017 Forest Plan. We need to continue monitoring fire effects before considering if a forest plan amendment to change the number of acres prescribed burned in the growing season is needed.
Concern 24 – Increased staffing is needed to achieve Rx fire program.	The Francis Marion uses a variety of tools to ensure adequate staffing to meet the goals and objectives of the prescribed fire program on the Francis Marion.
Concern 26 – Limited Prescribed Fire Operations in Mesic hardwood and forested swamps during the turkey hunting season might address some concerns. Concern 31b – A central communication site should post upcoming burn areas, so	Implementation of prescribed burns is heavily dependent on the presence of suitable conditions (e.g. weather and fuel conditions). As such, specific days that burning will are not generally known well in advance. Nevertheless, the South Carolina Forestry Commission is notified of burning activity. For daily up to date information and locations of prescribed burns on the forest, refer to the South Carolina Forestry Commission Burn Notifications for Forestry, Wildlife or Agriculture website located at http://www.state.sc.us/forest/scnotifs.htm . At this webpage, individuals can also request to receive text message notifications which are sent out on the day of a prescribed burn.

Appendix A: Response to Public Comments and Concern Statements

Concern Statement	Forest Service Response
spring turkey hunters can plan their upcoming hunts.	
Concern 35 - Timber sale units awaiting harvest can delay schedule burns for several years causing degradation of understory/mid-story conditions in the surrounding burn block	We continually coordinate internally during implementation to meet resource objectives. Timber management activities often provide similar benefits to prescribed burning by removing vegetation and reducing fuel loads.